

Message

From: Thomas Marvin [thomas.marvin@bayer.com]
Sent: 10/13/2020 7:52:13 PM
To: Echeverria, Marietta [Echeverria.Marietta@epa.gov]
Subject: RE: pre-emergent application rate
Attachments: Hooded Sprayer use in Cotton; Hooded Sprayer Drift Reduction Technology: Protocol

Marietta: Following up on our discussion, looks like the Cotton Bridge analysis and the Hooded Sprayer protocol went in last Friday and Sunday. Also: I confirmed with our team that we will send the revised label back by tomorrow.

Tom

From: Thomas Marvin
Sent: Tuesday, October 13, 2020 1:39 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Subject: RE: pre-emergent application rate

Yes, that would be great; thanks.

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Tuesday, October 13, 2020 1:18 PM
To: Thomas Marvin <thomas.marvin@bayer.com>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: pre-emergent application rate

Yes, does 2 pm work?

From: Thomas Marvin <thomas.marvin@bayer.com>
Sent: Tuesday, October 13, 2020 1:02 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: pre-emergent application rate

Marietta: Do you have a minute to discuss?

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Tuesday, October 13, 2020 11:26 AM
To: Thomas Marvin <thomas.marvin@bayer.com>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: pre-emergent application rate

Tom - I need a response today.

From: Thomas Marvin <thomas.marvin@bayer.com>
Sent: Friday, October 9, 2020 4:51 PM
To: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: pre-emergent application rate

Thanks Marietta. We are reviewing.

From: Echeverria, Marietta <Echeverria.Marietta@epa.gov>
Sent: Friday, October 9, 2020 1:51 PM
To: Thomas Marvin <thomas.marvin@bayer.com>
Cc: Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: pre-emergent application rate

Tom,

I heard back from EFED re: the question of the 0.5 lb AI/A rate vs. 1 lb AI/A and the potential impact on buffer distance. Here is the response:

“The relationship is not linear but rather follows the deposition curve, and therefore the buffer distance for 1 lb AI may be greater than double the buffer distance (*i.e.*, >480 ft) for 0.5 lb AI and is not evaluated in the risk assessment.”

Please confirm that Bayer agrees to changing the pre-emergent rate to 0.5 lb AI/A **asap**. Thank you.

Regards,
Marietta

Marietta Echeverria, Acting Director
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Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
703-305-8578